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Hon. Harold Baer, Jr.
United States District Judge
Southern District of New York
500 Pearl Street, Rm. 2230
New York, New York 10007-1312

Re: *The Export-Import Bank of the Republic of China
v. Grenada, 06 Civ. 2469 (HB) (AJP)*

Dear Judge Baer:

We represent Grenada in the above-referenced matter. By letter dated March 25, the Plaintiff advised the Court that the parties had reached an agreement in principle that would settle the issues raised in the pending motion to implement sanctions. The Court endorsed the letter by giving the parties until April 8 to finalize a Stipulation by which the motion would be withdrawn or, alternatively, for the Plaintiff to submit its reply on the pending motion. I am writing to advise the Court that I have reached an agreement with Plaintiff's counsel on the wording of the Stipulation but have not received authorization from my client to execute the Stipulation. I also learned today that the persons in the Grenadian government with the authority to approve the Stipulation are all traveling out of the country and I could not get assurance that any of them will be able to attend to the issue by the close of business tomorrow.

Under these circumstances, I would request that the Court extend the deadline for filing a stipulation discontinuing the motion or Plaintiff's reply until Wednesday, April 13. I have discussed this request with Plaintiff's counsel and he concurs with this request.

Respectfully submitted,

BB
Brian F. Maas

Paul E. Summit, Esq. (via email address ps summit@sandw.com)
Andrew T. Solomon, Esq. (via email address asolomon@sandw.com)

*SO ORDERED:
Harold Baer, Jr.
Date: 4/8/11*

Endorsement:

April 13, 2011 is fine but I'm dubious that this is more than another tactic to resolve the issue. We will see.